

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

**VALERIECE D. EALOM,
DEFENDANT**

vs.

CASE NO. 03-00329-02-CR-W-FJG

**UNITED STATES OF AMERICA,
PLAINTIFF**

REQUEST FOR HEARING ON SUPERVISED RELEASE VIOLATIONS

COMES NOW Defendant **VALERIECE D. EALOM**, requesting that this Honorable Court set a hearing for her alleged supervised release violations. This request is being made because the defendant has been in continuous federal custody for nearly 180 days.

BACKGROUND

Defendant **VALERIECE D. EALOM** was indicted and convicted in the Western District of Missouri in January of 2005 for violating federal statute on Controlled Substances. She was sentenced to 120 months in the Bureau of Prisons. She completed her sentence and commenced supervised release on July 30, 2014. As ordered by this Honorable Court, her term of supervised release was 5 years. She attended and completed a re-entry court program, thus reducing her term of supervised release to 3 years. This new term of supervised release was set to expire on July 29, 2017. A warrant was lodged for her arrest on July 25, 2017. She was placed in custody and has not been before the court for a violation hearing. She is housed at the Leavenworth Detention Center in Leavenworth, Kansas.

ARGUMENT

Defendant **EALOM** is requesting a hearing before the court so that she may be able to settle the matter at hand. She has attempted on several occasions to implore her defense counsel, Marc Ermine, to confer with the court for a hearing date. It was thought to have been assumed that some new charges were pending, but this has not been the case. There has been one "excuse" after another from defense counsel, which has left **EALOM** wondering what is the status of her supervised release violation. Defense counsel has given her the "run around" and no definitive answers about what happens next. Defendant **EALOM** has never been before this court on any violation, and is unaware of the process. She has requested (letter enclosed) that her defense counsel remove himself from the case, because of his poor communication, delays, and outright lies. Defendant **EALOM** is not versed in federal law, nor does she possess a law degree, but there has to be some time frame as to how long a defendant can sit in custody, without having a hearing. This constitutes a violation of her constitutional right to due process under the Fifth Amendment to the U.S. Constitution.

CONCLUSION

Defendant **VALERIECE D. EALOM** would like to request that this Honorable Court set a supervised release violation hearing.

Respectfully Submitted,

Valeriece D. Ealom

CERTIFICATE OF SERVICE

This is to certify that the foregoing motion is to be filed with the Clerk of the Court, United States District Court, Western District of Missouri, Western Division, 400 East 9th Street, Kansas City, Missouri 64106. This motion was sent via U.S. Mail, by the United States Postal Service.

Date: _____

Valeriece D. Ealom